

CR 16 096

COGAN, J.

LEVY, M.J.

FILED
CLERK

PT:AAS/KMT
F. #2015R01817

2016 MAR -1 PM 12: 29

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

U.S. DISTRICT COURT
EASTERN DISTRICT
OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA

I N D I C T M E N T

- against -

EDUARDO CORNEJO,

Defendant.

Cr. No. _____
(T. 18, U.S.C., §§ 1591(a)(1), 1591(a)(2),
1591(b)(2), 1594(d), 2421, 2428, 2 and 3551
et seq.; T. 21, U.S.C., § 853(p))

- - - - - X

THE GRAND JURY CHARGES:

COUNT ONE

(Transportation of Individuals to Engage in Prostitution)

1. In or about and between September 2014 and February 2016, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant EDUARDO CORNEJO, together with others, did knowingly transport one or more individuals in interstate commerce, to wit: from the State of New York to the State of New Jersey, with intent that such individuals engage in prostitution.

(Title 18, United States Code, Sections 2421, 2 and 3551 et seq.)

COUNT TWO

(Sex Trafficking of a Child)

2. In or about and between September 2014 and November 2015, within the Eastern District of New York and elsewhere, the defendant EDUARDO CORNEJO, together with others, did knowingly and intentionally recruit, entice, harbor, transport,

provide, obtain and maintain by any means a person, to wit: Jane Doe, an individual whose identity is known to the Grand Jury, in and affecting interstate commerce, and did benefit, financially and by receiving things of value from participation in a venture that engaged in such acts, knowing, and in reckless disregard of the fact, that Jane Doe had not attained the age of 18 years and would be caused to engage in one or more commercial sex acts.

(Title 18, United States Code, Sections 1591(a)(1), 1591(a)(2), 1591(b)(2), 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION
AS TO COUNT ONE

3. The United States hereby gives notice to the defendant EDUARDO CORNEJO that, upon his conviction of the offense charged in Count One, the government will seek forfeiture pursuant to Title 18, United States Code, Section 2428, which requires the forfeiture of any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of such offense, and any property, real or personal, constituting or derived from proceeds obtained, directly or indirectly, as a result of such offense.

4. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 2428; Title 21, United States Code, Section 853(p))

CRIMINAL FORFEITURE ALLEGATION
AS TO COUNT TWO

5. The United States hereby gives notice to the defendant EDUARDO CORNEJO that, upon his conviction of the offense charged in Count Two, the government will seek forfeiture in accordance with Title 18, United States Code, Section 1594(d), which requires the forfeiture of any property, real or personal, that was used or intended to be used to commit, or to facilitate the commission of such offense, and any property, real or personal, constituting or derived from proceeds obtained, directly or indirectly, as a result of such offense.

6. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

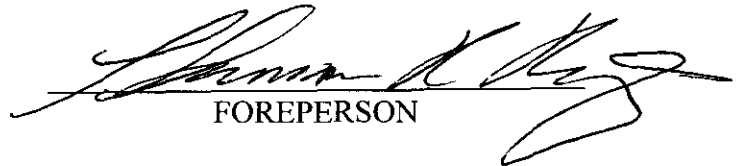
- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 1594(d); Title 21, United States Code, Section 853(p))

A TRUE BILL



FOREPERSON



ROBERT L. CAPERS
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

F. #2015R01817
FORM DBD-34
JUN. 85

No. _____

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

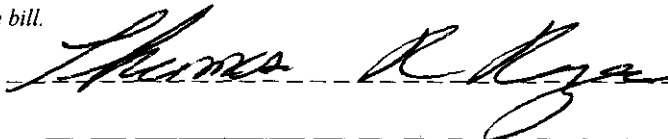
EDUARDO CORNEJO,

Defendant.

INDICTMENT

(T. 18, U.S.C., §§ 1591(a)(1), 1591(a)(2), 1591(b)(2), 1594(d), 2421, 2428,
2 and 3551 et seq.; T. 21, U.S.C., § 853(p))

A true bill.



Foreperson

Filed in open court this _____ day,

of _____ A.D. 20 _____

Clerk

Bail, \$ _____

Alexander A. Solomon, Assistant U.S. Attorney (718) 254-6074